



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

TO: Interested Parties / Applicant

DATE: October 25, 2007

RE: Isaac Tire Premier Bandag / 003-22686-00342

FROM: Nisha Sizemore
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures
FNPER.dot 03/23/06



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Thomas W. Easterly
Commissioner

100 North Senate Avenue
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Indianapolis, Indiana 46204-2251
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NEW SOURCE REVIEW AND MINOR SOURCE OPERATING PERMIT OFFICE OF AIR QUALITY

**Isaac Tire Premier Bandag
3525 Independence Drive
Fort Wayne, Indiana 46808**

(herein known as the Permittee) is hereby authorized to construct and operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-5.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a MSOP under 326 IAC 2-6.1.

Operation Permit No.: M003-22686-00342	
Issued by: <i>Original document signed by</i> Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: October 25, 2007 Expiration Date: October 25, 2012

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SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in Conditions A.1 and A.2 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-5.1-3(c)][326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary rubber tire retreading operation.

Source Address:	3525 Independence Drive, Fort Wayne, Indiana 46808
Mailing Address:	3525 Independence Drive, Fort Wayne, Indiana 46808
General Source Phone Number:	(260) 482-9770
SIC Code:	7534
County Location:	Allen
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit
	Minor Source, under PSD
	Minor Source, Section 112 of the Clean Air Act
	Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary

This stationary source consists of the following emission units and pollution control devices:

- (a) Tire buffing operations to trim rubber from tires, consisting of the following:
 - (1) One (1) automatic tire buffer system installed in 1996, identified as TB-1, with a maximum capacity of ten (10) tires per hour, using a blower to convey trimmings to an accumulation trailer, exhausting to three (3) trailer vents, identified as trailer vents 1, 2, and 3. The trailer is equipped with wall filters for control of particulates.
 - (2) One (1) automatic tire buffer system installed in 2003, identified as TB-2, with a maximum capacity of ten (10) tires per hour, using a blower to convey trimmings to an accumulation trailer, exhausting to three (3) trailer vents, identified as trailer vents 1, 2, and 3. The trailer is equipped with wall filters for control of particulates.
 - (3) One (1) manual tire buffer system installed in 1994, identified as TB-3, with a maximum capacity of ten (10) tires per hour, using a blower to convey trimmings to an accumulation trailer, exhausting to three (3) trailer vents, identified as trailer vents 1, 2, and 3. The trailer is equipped with wall filters for control of particulates.
- (b) One (1) wheel refinishing/final stage area, consisting of the following:
 - (1) One (1) rim shot blasting operation installed in 2002, identified as RSB-1, processing a maximum of twelve (12) rims per hour with a maximum capacity of less than 100 pounds of abrasive per hour, with particulate emissions controlled by cartridge-type dust filters, identified as reclaim filter, and exhausting internally.

- (2) One (1) rim powder coat system installed in 1996, identified as PCB-1, processing a maximum of twenty (20) tire rims per hour, with particulate emissions controlled by cartridge-type dust filters, identified as PC filter, and exhausting internally.
 - (3) One (1) electric cure unit installed in 1996, identified as PBO-1, processing a maximum of four (4) rims per hour, and exhausting internally.
- (c) One (1) van trailer refurbishing operation, consisting of the following:
 - (1) One (1) surface coating operation with two (2) spray applicators to be installed in 2007, using air atomized spraying methods to coat metal van trailers, identified as P01, with a maximum capacity of 6.5 gallons per trailer and one (1) trailer per day, using dry filters for particulate control, and exhausting to stacks P01A and P01B.
- (d) One (1) tire coating operation installed in 1995, identified as BTP-1, using mechanical air atomized spray applicators with tires sprayed inside of a metal enclosure, with a maximum capacity of 0.12 gallons per tire processing a maximum of sixty (60) tires per hour, and exhausting internally.
- (e) Six (6) electric heat curing chambers, identified as Cure 1 through Cure 6, processing a maximum of twenty-two (22) tires per cycle each, which is equivalent to 5.5 tires per hour each, and exhausting to one (1) stack (Stack Cure 1). Construction of Cure 1, Cure 2, Cure 3, Cure 4, Cure 5, and Cure 6 commenced in 1989, 1989, 1989, 1998, 1999, and 1999, respectively.
- (f) One (1) tire repair/patch area with three (3) work stations/work benches installed in 1989, identified as SK-1 through SK-3, with a maximum capacity of thirty (30) tires per hour. The air flow from SK-1 through SK-3 is ducted to the accumulation trailer, which exhausts to three (3) trailer vents, identified as trailer vents 1, 2, and 3.
- (g) Rubber extruding operations, to apply new rubber base for tires, consisting of the following:
 - (1) One (1) cushion extruder installed in 2002, identified as Base 1, processing a maximum of twenty six (26) pounds of extruded rubber base onto a maximum of ten (10) tires per hour, and using no controls.
 - (2) One (1) cushion extruder installed in 2003, identified as Base 2, processing a maximum of twenty six (26) pounds of extruded rubber base onto a maximum of ten (10) tires per hour, and using no controls.
- (h) Rubber extruding operations, to apply new tire treads, consisting of the following:
 - (1) One (1) rubber tread application installed in 1994, identified as Tread 1, processing a maximum of twenty six (26) pounds of extruded rubber tread onto a maximum of ten (10) tires per hour, and using no controls.
 - (2) One (1) rubber tread application installed in 1995, identified as Tread 2, processing a maximum of twenty six (26) pounds of extruded rubber tread onto a maximum of ten (10) tires per hour, and using no controls.

- (3) One (1) rubber tread application installed in 1994, identified as Tread 3, processing a maximum of twenty six (26) pounds of extruded rubber tread onto a maximum of ten (10) tires per hour, and using no controls.
- (4) One (1) rubber tread application installed in 1994, identified as Tread 4, processing a maximum of twenty six (26) pounds of extruded rubber tread onto a maximum ten (10) tires per hour, and using no controls.
- (i) A two component liquid mix operation, used to fill farm equipment tires. When the two components are mixed a solid foam is formed. This operation was installed in 2002 and is identified as FT-1. The maximum capacity is 1.0 tire per 10 minute cycle. VOC and HAP emissions from this operation are negligible because each of the two liquid components are maintained in pressurized containers and are injected into farm tires. The reaction of the two components occurs within the pressurized inner tubes of the tires.
- (j) Water related activities including:
 - (1) Production of hot water for on-site personal use not related to any industrial or production process.
 - (2) Steam traps, vents, leaks and safety relief valves.
 - (3) Pressure washing of equipment.
- (k) Combustion activities including the following:
 - (1) Fuel use related to food preparation for on-site consumption.
 - (2) Combustion emissions from propulsion of mobile sources.
- (l) Ventilation and venting related equipment including the following:
 - (1) Ventilation exhaust, central chiller water systems, refrigeration and air conditioning equipment, not related to any industrial or production process, including natural draft hoods or ventilating systems that do not remove air pollutants.
 - (2) Stack and vents from plumbing traps used to prevent the discharge of sewer gases, handling domestic sewage only, excluding those at wastewater treatment plants or those handling any industrial waste.
 - (3) Natural gas pressure regulator vents, excluding venting at oil and gas production facilities.
 - (4) Air vents from air compressors.
- (m) Activities related to routine fabrication, maintenance and repair of buildings, structures, equipment or vehicles at the source where air emissions from those activities would not be associated with any commercial production process including the following:
 - (1) Activities associated with the repair and maintenance of paved and unpaved roads, including paving or sealing, or both, of parking lots and roadways.
 - (2) Painting, including interior and exterior painting of buildings, and solvent use, excluding degreasing operations utilizing halogenated organic solvents.
 - (3) Brazing, soldering, or welding operations and associated equipment.
 - (4) Portable blast-cleaning equipment with enclosures.
 - (5) Lubrication, including hand-held spray can lubrication, dipping metal parts into lubricating oil, and manual or automated addition of cutting oil in machining operations.
 - (6) Instrument air dryer and filter maintenance.
 - (7) Tarring, retarring, and repair of roofs.

- (n) Activities performed using hand-held equipment including the following:
 - (1) Application of hot melt adhesives with no VOC in the adhesive formulation.
 - (2) Buffing.
 - (3) Cutting, excluding cutting torches.
 - (4) Drilling.
 - (5) Grinding.
 - (6) Machining wood, metal, or plastic.
 - (7) Polishing.
 - (8) Routing.
 - (9) Sanding.
 - (10) Sawing.
 - (11) Turning wood, metal, or plastic.
 - (12) Surface grinding.
- (o) Housekeeping and janitorial activities and supplies including the following:
 - (1) Vacuum cleaning systems used exclusively for housekeeping or custodial activities, or both.
 - (2) Steam cleaning activities.
 - (3) Rest rooms and associated cleanup operations and supplies.
 - (4) Alkaline or phosphate cleaners and associated equipment.
 - (5) Mobile floor sweepers and floor scrubbers.
 - (6) Pest control fumigation.
- (p) Office related activities including the following:
 - (1) Office supplies and equipment.
 - (2) Photocopying equipment and associated supplies.
 - (3) Paper shredding.
 - (4) Blueprint machines, photographic equipment, and associated supplies.
- (q) Lawn care and landscape maintenance activities and equipment, including the storage, spraying or application of insecticides, pesticides and herbicides.
- (r) Storage equipment and activities including:
 - (1) Pressurized storage tanks and associated piping for the following:
 - (a) Acetylene.
 - (b) Liquid natural gas (LNG)(propane).
 - (2) Storage of drums containing maintenance raw materials.
 - (3) Portable containers used for the collection, storage, or disposal of materials provided the container capacity is equal to or less than 0.46 cubic meters and the container is closed except when the material is added or removed.
- (s) Emergency and standby equipment including:
 - (1) Safety and emergency equipment, except engine driven fire pumps, including fire suppression systems and emergency road flares.

- (t) Sampling and testing equipment and activities including the following:
 - (1) Equipment used for quality control/assurance or inspection purposes, including sampling equipment used to withdraw materials for analysis.
 - (2) Instrument air dryers and distribution.
- (u) Use of consumer products and equipment where the product or equipment is used at a source in the same manner as normal consumer use and is not associated with any production process.
- (v) Activities generating limited amounts of fugitive dust including:
 - (1) Fugitive emissions related to movement of passenger vehicles, provided the emissions are not counted for applicability purposes under 326 IAC 2-7-1(21)(B), and any required fugitive dust control plan or its equivalent is submitted.
 - (2) Road salting and sanding.
- (w) Activities associated with production including the following:
 - (1) Application equipment for hot melt adhesives with no VOC in the adhesive formulation.
 - (2) Air compressors and pneumatically operated equipment, including hand tools.
 - (3) Compressor or pump lubrication and seal oil systems.
- (x) Miscellaneous equipment, but not emissions associated with the process for which the equipment is used, and activities including the following:
 - (1) Equipment used for surface coating, painting, dipping or spraying operation, except those that will emit VOCs or HAPs.
 - (2) Electric or steam heated drying ovens and autoclaves, including only the heating emissions and not any associated process emissions.
 - (3) Manual loading and unloading operations.
 - (4) Construction and demolition operations.
 - (5) Mechanical equipment gear boxes and vents which are isolated from process materials.
- (y) Space heaters or process heaters using the following fuels.
 - (1) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
- (z) Combustion source flame safety purging on startup.
- (aa) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.
- (bb) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (cc) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
 - (1) Cleaners and solvents characterized as follows:
 - (A) having a vapor pressure equal to or less than 2 kPa; 15mm Hg; or 0.3 psi measured at 38 degrees C (100 degrees F); or

- (B) having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20 degrees C (68 degrees F);

the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.

- (dd) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, and welding equipment.
- (ee) Any operation using aqueous solutions containing less than 1% by weight of VOCs and excluding HAPs.
- (ff) Water based adhesives that are less than or equal to 5% by volume of VOCs and excluding HAPs.
- (gg) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (hh) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone.
- (ii) Paved and unpaved roads and parking lots with public access.
- (jj) One-site fire and emergency response training approved by the department.
- (kk) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.
- (ll) Filter or coalescer media changeout.

B.1 Definitions [326 IAC 2-1.1-1]

B.2 Revocation of Permits [326 IAC 2-1.1-9(5)]

B.3 Affidavit of Construction [326 IAC 2-5.1-3(h)] [326 IAC 2-5.1-4]

(c) The Permittee shall attach the Operation Permit Validation Letter received from the Office of Air Quality (OAQ) to this permit.

B.4 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

(b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

B.5 Term of Conditions [326 IAC 2-1.1-9.5]

(b) the emission unit to which the condition pertains permanently ceases operation.

B.6 Enforceability

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.7 Severability

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.8 Property Rights or Exclusive Privilege

This permit does not convey any property rights of any sort or any exclusive privilege.

B.9 Duty to Provide Information

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.10 Certification

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an "authorized individual" of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

B.11 Annual Notification [326 IAC 2-6.1-5(a)(5)]

- (a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, IN 46204-2251

- (c) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

B.12 Preventive Maintenance Plan [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

The PMP extension notification does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to M003-22686-00342 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.

- (b) All previous registrations and permits are superseded by this permit.

B.14 Termination of Right to Operate [326 IAC 2-6.1-7(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least ninety (90) days prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-6.1-7.

B.15 Permit Renewal [326 IAC 2-6.1-7]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-6.1-7. Such information shall be included in the application for each emission unit at this source. The renewal application does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

- (b) A timely renewal application is one that is:
- (1) Submitted at least ninety (90) days prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-6.1 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.16 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

Any such application shall be certified by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

B.17 Source Modification Requirement

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2.

B.18 Inspection and Entry

[326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.19 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]

- (a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

The application which shall be submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement notice-only changes addressed in the request for a notice-only change immediately upon submittal of the request. [326 IAC 2-6.1-6(d)(3)]

B.20 Annual Fee Payment [326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing.
- (b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.21 Credible Evidence [326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

C.2 Permit Revocation [326 IAC 2-1.1-9]

Pursuant to 326 IAC 2-1.1-9 (Revocation of Permits), this permit to construct and operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.

C.6 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue
MC 61-52 IGCN 1003
Indianapolis, Indiana 46204-2251

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

Testing Requirements [326 IAC 2-6.1-5(a)(2)]

C.8 Performance Testing [326 IAC 3-6]

- (a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.9 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-6.1-5(a)(2)]

C.10 Compliance Monitoring [326 IAC 2-1.1-11]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60, Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

C.12 Instrument Specifications [326 IAC 2-1.1-11]

-
- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.
 - (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

Corrective Actions and Response Steps

C.13 Response to Excursions or Exceedances

-
- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
 - (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:
 - (1) initial inspection and evaluation;
 - (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or
 - (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
 - (1) monitoring results;
 - (2) review of operation and maintenance procedures and records; and/or
 - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall maintain the following records:
 - (1) monitoring data;
 - (2) monitor performance data, if applicable; and
 - (3) corrective actions taken.

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]

C.15 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.

- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.16 General Record Keeping Requirements [326 IAC 2-6.1-5]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.17 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) Reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emission Unit Description:

- (a) Tire buffing operations to trim rubber from tires, consisting of the following:
- (1) One (1) automatic tire buffer system installed in 1996, identified as TB-1, with a maximum capacity of ten (10) tires per hour, using a blower to convey trimmings to an accumulation trailer, exhausting to three (3) trailer vents, identified as trailer vents 1, 2, and 3. The trailer is equipped with wall filters for control of particulates.
 - (2) One (1) automatic tire buffer system installed in 2003, identified as TB-2, with a maximum capacity of ten (10) tires per hour, using a blower to convey trimmings to an accumulation trailer, exhausting to three (3) trailer vents, identified as trailer vents 1, 2, and 3. The trailer is equipped with wall filters for control of particulates.
 - (3) One (1) manual tire buffer system installed in 1994, identified as TB-3, with a maximum capacity of ten (10) tires per hour, using a blower to convey trimmings to an accumulation trailer, exhausting to three (3) trailer vents, identified as trailer vents 1, 2, and 3. The trailer is equipped with wall filters for control of particulates.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards

D.1.1 Particulate Emission Limitations [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from each of the three (3) tire buffing systems (TB-1, TB-2, and TB-3) shall not exceed the pound per hour limits listed in the table below:

Unit ID	Unit Description	Maximum Throughput Rate (tons/hr)	Particulate Emission Limit (lbs/hr)
TB-1	Tire Buffing System	0.63	2.99
TB-2	Tire Buffing System	0.63	2.99
TB-3	Tire Buffing System	0.63	2.99

The pounds per hour limitations were calculated using the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

D.1.2 Particulate Emissions [326 IAC 2-6.1-5]

In order to comply with 326 IAC 2-6.1, the uncontrolled PM and PM-10 emission rates for tire buffing systems (TB-1, TB-2, and TB-3) shall not exceed 0.05 pounds per pound of rubber removed.

D.1.3 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the three (3) tire buffing systems (TB-1, TB-2, and TB-3) and any control devices.

Compliance Determination Requirements

D.1.4 Particulate Control

In order to comply with Condition D.1.1 water misting for the buffer systems and wall filters for the accumulation trailer(s) shall be utilized at all times that any one of the three (3) tire buffing systems (TB-1, TB-2, or TB-3) are in operation.

D.1.5 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

In order to demonstrate compliance with Conditions D.1.1 and D.1.2, the Permittee shall perform PM and PM-10 testing for the tire buffing system(s) within 90 days after issuance of the permit, utilizing methods as approved by the Commissioner. This is a one time testing requirement. PM-10 includes filterable and condensable PM-10. Testing shall be conducted in accordance with Section C - Performance Testing.

Compliance Monitoring Requirements

D.1.6 Visible Emissions Notations

- (a) Visible emission notations of the tire buffing systems (TB-1, TB-2, and TB-3) vent exhausts (trailer vents 1, 2, and 3) shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

D.1.7 Monitoring

Daily inspections shall be performed to verify the placement, integrity and particle loading of the wall filters for the accumulation trailer(s). To monitor the performance of the wall filters, daily visible emission notations shall be made of the accumulation trailer(s) vents (trailer vents 1, 2, and 3) as specified in Condition D.1.6 while one or more of the tire buffing systems (TB-1, TB-2, and TB-3) are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

D.1.8 Wall Filter Failure Detection

In the event that a wall filter failure has been observed:

The associated process will be shut down immediately until the failed wall filters have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions). Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.1.9 Record Keeping Requirements

- (a) To document compliance with Condition D.1.6, the Permittee shall maintain records of daily visible emission notations of the vent exhausts (trailer vents 1, 2, and 3). The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).
- (b) To document compliance with Condition D.1.7, the Permittee shall maintain records of daily inspections of the accumulation trailer(s) wall filters.
- (c) To document compliance with Condition D.1.8, the Permittee shall maintain records of the date and time that the wall filters for the accumulation trailer(s) were repaired or replaced.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emission Unit Description:

- (b) One (1) wheel refinishing/final stage area, consisting of the following:
- (1) One (1) rim shot blasting operation installed in 2002, identified as RSB-1, processing a maximum of twelve (12) rims per hour with a maximum capacity of less than 100 pounds of abrasive per hour, with particulate emissions controlled by cartridge-type dust filters, identified as reclaim filter, and exhausting internally.
 - (2) One (1) rim powder coat system installed in 1996, identified as PCB-1, processing a maximum of twenty (20) tire rims per hour, with particulate emissions controlled by cartridge-type dust filters, identified as PC filter, and exhausting internally.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards

D.2.1 Particulate Emission Limitations [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from shot blasting unit (RSB-1) and the rim powder coating system (PCB-1) shall not exceed the pound per hour limits listed in the table below:

Unit ID	Unit Description	Maximum Throughput Rate (tons/hr)	Particulate Emission Limit (lbs/hr)
RSB-1	Shot Blasting (Tire Rims)	< 0.05	0.551
PCB-1	Rim Powder Coating System	< 0.05	0.551

The pounds per hour limitations were calculated using the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

D.2.2 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the shot blasting unit (RSB-1) and any control devices.

Compliance Determination Requirements

D.2.3 Particulate Control

- (a) In order to comply with Condition D.2.1, the cartridge-type dust filters shall be in operation and control particulate emissions from the shot blasting unit (RSB-1) at all times that the shot blasting unit is in operation.
- (b) In order to comply with Condition D.2.1, the cartridge-type dust filters shall be in operation and control particulate emissions from the rim powder coating system (PCB-1) at all times that the rim powder coating system is in operation.

Compliance Monitoring Requirements

D.2.4 Parametric Monitoring

- (a) The Permittee shall record the pressure drop across the cartridge-type dust filters used in conjunction with the shot blasting unit (RSB-1), at least once daily when the shot blasting unit is in operation. When for any one reading, the pressure drop across the dust filters are outside the normal range of 0.5 and 3.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

- (b) Daily inspections shall be performed to verify the placement, integrity and particle loading of the cartridge-type dust filters for the rim powder coating system (PCB-1). If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

In the event that a cartridge-type dust filter failure has been observed:

The associated process will be shut down immediately until the failed dust filters have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions). Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.2.5 Record Keeping Requirements

- (a) To document compliance with Condition D.2.4(a), the Permittee shall maintain a daily record of the pressure drop across the cartridge-type dust filters controlling the shot blasting unit (RSB-1). The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).

- (b) To document compliance with Condition D.2.4(b), the Permittee shall maintain records of when the cartridge-type dust filters for the rim powder coating system (PCB-1) were repaired or replaced.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

Emission Unit Description:

- (c) One (1) van trailer refurbishing operation, consisting of the following:
 - (1) One (1) surface coating operation with two (2) spray applicators to be installed in 2007, using air atomized spraying methods to coat metal van trailers, identified as P01, with a maximum capacity of 6.5 gallons per trailer and one (1) trailer per day, using dry filters for particulate control, and exhausting to stacks P01A and P01B.
- (d) One (1) tire coating operation installed in 1995, identified as BTP-1, using mechanical air atomized spray applicators with tires sprayed inside of a metal enclosure, with a maximum capacity of 0.12 gallons per tire processing a maximum of sixty (60) tires per hour, and exhausting internally.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards

D.3.1 Particulate [326 IAC 6-3-2(d)]

- (a) Pursuant to 326 IAC 6-3-2(d) (Particulate Emission Limitations for Manufacturing Processes), particulate from the surface coating operation (P01) and tire coating operation (BTP-1) shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications.
- (b) If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:
 - (1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
 - (2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
- (c) If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

D.3.2 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the tire coating operation (BTP-1) and any control devices.

Compliance Determination Requirements

D.3.3 Particulate Control

- (a) In order to comply with Condition D.3.1, the dry filters for surface coating operation (P01) shall be in operation and control particulate emissions at all times that the surface coating operation (P01) is in use.

- (b) In order to comply with Condition D.3.1, the metal enclosure for tire coating operation (BTP-1) shall be utilized at all times that the tire coating operation (BTP-1) is in use.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH**

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

Company Name:	Isaac Tire Premier Bandag
Address:	3525 Independence Drive
City:	Fort Wayne, Indiana 46808
Phone #:	(260) 482-9770
MSOP #:	M003-22686-00342

I hereby certify that Isaac Tire Premier Bandag:

☐ still in operation.

☐ no longer in operation.

I hereby certify that Isaac Tire Premier Bandag:

☐ in compliance with the requirements of
MSOP No.: M003-22686-00342.

☐ not in compliance with the requirements
of MSOP No.: M003-22686-00342.

Authorized Individual (typed):
Title:
Signature:
Date:

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

Noncompliance:

MALFUNCTION REPORT

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
FAX NUMBER - 317 233-6865**

**This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6
and to qualify for the exemption under 326 IAC 1-6-4.**

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ?_____, 25 TONS/YEAR SULFUR DIOXIDE ?_____, 25 TONS/YEAR NITROGEN OXIDES?_____, 25 TONS/YEAR VOC ?_____, 25 TONS/YEAR HYDROGEN SULFIDE ?_____, 25 TONS/YEAR TOTAL REDUCED SULFUR ?_____, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?_____, 25 TONS/YEAR FLUORIDES ?_____, 100TONS/YEAR CARBON MONOXIDE ?_____, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ?_____, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ?_____, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?_____, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ?_____. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERM LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF >MALFUNCTION= AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY: _____ PHONE NO. () _____
LOCATION: (CITY AND COUNTY) _____
PERMIT NO. _____ AFS PLANT ID: _____ AFS POINT ID: _____ INSP: _____
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: _____

DATE/TIME MALFUNCTION STARTED: ____/____/20____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE ____/____/20____ _____ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO₂, VOC, OTHER: _____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____
CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____
CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____
INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

MALFUNCTION REPORTED BY: _____ TITLE: _____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

**Please note - This form should only be used to report malfunctions
applicable to Rule 326 IAC 1-6 and to qualify for
the exemption under 326 IAC 1-6-4.**

326 IAC 1-6-1 Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

326 IAC 1-2-39 "Malfunction" definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

***Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

Mail to: Permit Administration & Development Section
Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

Isaac Tire Premier Bandag
3525 Independence Drive
Fort Wayne, Indiana 46808

Affidavit of Construction

I, _____, being duly sworn upon my oath, depose and say:
(Name of the Authorized Representative)

1. I live in _____ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.
2. I hold the position of _____ for _____.
(Title) (Company Name)
3. By virtue of my position with _____, I have personal
(Company Name)
knowledge of the representations contained in this affidavit and am authorized to make these
representations on behalf of _____.
(Company Name)
4. I hereby certify that Isaac Tire Premier Bandag at 3525 Independence Drive, Fort Wayne, Indiana 46808, completed construction of the rubber tire retreading operation on _____ in conformity with the requirements and intent of the construction permit application received by the Office of Air Quality on and as permitted pursuant to New Source Review and Minor Source Operating Permit No. M003-22686-00342, Plant ID No. _____, issued on _____.

Further Affiant said not.

I affirm under penalties of perjury that the representations contained in this affidavit are true, to the best of my information and belief.

Signature _____

Date _____

STATE OF INDIANA)
)SS

COUNTY OF _____)

Subscribed and sworn to me, a notary public in and for _____ County and State of
Indiana on this _____ day of _____, 20 _____.
My Commission expires: _____.

Signature _____

Name (typed or printed)

**Indiana Department of Environmental Management
Office of Air Quality**

Addendum to the
Technical Support Document for a New Source Review and
Minor Source Operating Permit (MSOP)

Source Name:	Isaac Tire Premier Bandag
Source Location:	3525 Independence Drive, Fort Wayne, Indiana, 46808
County:	Allen
Operation Permit No.:	M003-22686-00342
SIC Code:	7534
Permit Reviewer:	Tanya White/EVP

On September 19, 2007, the Office of Air Quality (OAQ) had a notice published in the Fort Wayne Journal Gazette News, Fort Wayne, Indiana, stating that Isaac Tire Premier Bandag had applied for a New Source Review and Minor Source Operating Permit (MSOP) to construct and operate a rubber tire retreading operation. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On October 3, 2007, Isaac Tire Premier Bandag submitted a comment on the proposed MSOP permit. The summary of the comment and corresponding response is as follows:

Comment 1: Isaac Tire Premier Bandag is requesting that the potential to emit calculations for the hot air curing ovens (Cure 1 through Cure 6) be removed from Appendix A of the Technical Support Document (TSD) because these ovens are electric. Therefore, these ovens have no emissions of volatile organic compounds (VOC) or hazardous air pollutants (HAP) associated with fuel combustion.

Response 1: The potential to emit for the curing operations was calculated using U.S. EPA's AP-42 emission factors from Section 4.12 (Manufacture of Rubber Products) and the maximum throughput rate for the ovens. The potential to emit calculations for the hot air curing ovens (Cure 1 through Cure 6) include VOC and HAP emissions from heating/curing rubber products and do not include emissions from fuel combustion. Therefore, the potential emissions of VOCs and HAPs from the hot air curing ovens (Cure 1 through Cure 6) were not removed from Appendix A of the Technical Support Document as requested by the source because these operations could potentially emit VOC and HAP emissions from the rubber curing process.

**Indiana Department of Environmental Management
Office of Air Quality**

**Technical Support Document (TSD) for a New Source Review
and Minor Source Operating Permit (MSOP)**

Source Description and Location
--

Source Name:	Isaac Tire Premier Bandag
Source Location:	3525 Independence Drive, Fort Wayne, Indiana, 46808
County:	Allen
SIC Code:	7534
Operation Permit No.:	M003-22686-00342
Permit Reviewer:	Tanya White/EVP

The OAQ has received an application from Isaac Tire Premier Bandag related to the construction and operation of a rubber tire retreading operation.

Existing Approvals

There have been no previous approvals issued to this source.

County Attainment Status

The source is located in Allen County.

Pollutant	Status
PM-10	Attainment
PM2.5	Attainment
SO ₂	Attainment
NO _x	Attainment
8-hour Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) Allen County has been classified as attainment for PM2.5. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD) (326 IAC 2-2) for PM 2.5 emissions. Therefore, until the U.S. EPA adopts specific provisions for PSD review for PM2.5 emissions, it has directed states to regulate PM-10 emissions as a surrogate for PM2.5 emissions. See the State Rule Applicability – Entire Source section.
- (b) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to the ozone standards. On September 6, 2007, the Indiana Air Pollution Control Board adopted an emergency rule for the redesignation of several counties, including Allen, Elkhart, Clark, Floyd, LaPorte, and St. Joseph, to attainment for the 8-hour ozone standard. The source is located in Allen County; therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration, 326 IAC 2-2.

- (c) Allen County has been classified as attainment or unclassifiable in Indiana for all other regulated pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD) (326 IAC 2-2). See the State Rule Applicability – Entire Source section.
- (d) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD applicability.

Description of the New Source Review

The Office of Air Quality (OAQ) has reviewed a new source review application, submitted by Isaac Tire Premier Bandag on February 21, 2006, relating to the construction and operation of a rubber tire retreading operation. On January 8, 2007, OAQ, received an application from Isaac Tire Premier Bandag to construct and operate a van trailer refurbishing operation, consisting of surface coating operations. This request will be combined into Minor Source Operating Permit (MSOP) No.: M003-22686-00342.

The following is a list of the emission units and pollution control devices at this plant:

- (a) Tire buffing operations to trim rubber from tires, consisting of the following:
 - (1) One (1) automatic tire buffer system installed in 1996, identified as TB-1, with a maximum capacity of ten (10) tires per hour, using a blower to convey trimmings to an accumulation trailer, exhausting to three (3) trailer vents, identified as trailer vents 1, 2, and 3. The trailer is equipped with wall filters for control of particulates.
 - (2) One (1) automatic tire buffer system installed in 2003, identified as TB-2, with a maximum capacity of ten (10) tires per hour, using a blower to convey trimmings to an accumulation trailer, exhausting to three (3) trailer vents, identified as trailer vents 1, 2, and 3. The trailer is equipped with wall filters for control of particulates.
 - (3) One (1) manual tire buffer system installed in 1994, identified as TB-3, with a maximum capacity of ten (10) tires per hour, using a blower to convey trimmings to an accumulation trailer, exhausting to three (3) trailer vents, identified as trailer vents 1, 2, and 3. The trailer is equipped with wall filters for control of particulates.
- (b) One (1) wheel refinishing/final stage area, consisting of the following:
 - (1) One (1) rim shot blasting operation installed in 2002, identified as RSB-1, processing a maximum of twelve (12) rims per hour with a maximum capacity of less than 100 pounds of abrasive per hour, with particulate emissions controlled by cartridge-type dust filters, identified as reclaim filter, and exhausting internally.
 - (2) One (1) rim powder coat system installed in 1996, identified as PCB-1, processing a maximum of twenty (20) tire rims per hour, with particulate emissions controlled by cartridge-type dust filters, identified as PC filter, and exhausting internally.
 - (3) One (1) electric cure unit installed in 1996, identified as PBO-1, processing a maximum of four (4) rims per hour, and exhausting internally.

- (c) One (1) van trailer refurbishing operation, consisting of the following:
 - (1) One (1) surface coating operation with two (2) spray applicators to be installed in 2007, using air atomized spraying methods to coat metal van trailers, identified as P01, with a maximum capacity of 6.5 gallons per trailer and one (1) trailer per day, using dry filters for particulate control, and exhausting to stacks P01A and P01B.
- (d) One (1) tire coating operation installed in 1995, identified as BTP-1, using mechanical air atomized spray applicators with tires sprayed inside of a metal enclosure, with a maximum capacity of 0.12 gallons per tire processing a maximum of sixty (60) tires per hour, and exhausting internally.
- (e) Six (6) electric heat curing chambers, identified as Cure 1 through Cure 6, processing a maximum of twenty-two (22) tires per cycle each, which is equivalent to 5.5 tires per hour each, and exhausting to one (1) stack (Stack Cure 1). Construction of Cure 1, Cure 2, Cure 3, Cure 4, Cure 5, and Cure 6 commenced in 1989, 1989, 1989, 1998, 1999, and 1999, respectively.
- (f) One (1) tire repair/patch area with three (3) work stations/work benches installed in 1989, identified as SK-1 through SK-3, with a maximum capacity of thirty (30) tires per hour. The air flow from SK-1 through SK-3 is ducted to the accumulation trailer, which exhausts to three (3) trailer vents, identified as trailer vents 1, 2, and 3.
- (g) Rubber extruding operations, to apply new rubber base for tires, consisting of the following:
 - (1) One (1) cushion extruder installed in 2002, identified as Base 1, processing a maximum of twenty six (26) pounds of extruded rubber base onto a maximum of ten (10) tires per hour, and using no controls.
 - (2) One (1) cushion extruder installed in 2003, identified as Base 2, processing a maximum of twenty six (26) pounds of extruded rubber base onto a maximum of ten (10) tires per hour, and using no controls.
- (h) Rubber extruding operations, to apply new tire treads, consisting of the following:
 - (1) One (1) rubber tread application installed in 1994, identified as Tread 1, processing a maximum of twenty six (26) pounds of extruded rubber tread onto a maximum of ten (10) tires per hour, and using no controls.
 - (2) One (1) rubber tread application installed in 1995, identified as Tread 2, processing a maximum of twenty six (26) pounds of extruded rubber tread onto a maximum of ten (10) tires per hour, and using no controls.
 - (3) One (1) rubber tread application installed in 1994, identified as Tread 3, processing a maximum of twenty six (26) pounds of extruded rubber tread onto a maximum of ten (10) tires per hour, and using no controls.
 - (4) One (1) rubber tread application installed in 1994, identified as Tread 4, processing a maximum of twenty six (26) pounds of extruded rubber tread onto a maximum ten (10) tires per hour, and using no controls.

- (i) A two component liquid mix operation, used to fill farm equipment tires. When the two components are mixed a solid foam is formed. This operation was installed in 2002 and is identified as FT-1. The maximum capacity is 1.0 tire per 10 minute cycle. VOC and HAP emissions from this operation are negligible because each of the two liquid components are maintained in pressurized containers and are injected into farm tires. The reaction of the two components occurs within the pressurized inner tubes of the tires.
- (j) Water related activities including:
 - (1) Production of hot water for on-site personal use not related to any industrial or production process.
 - (2) Steam traps, vents, leaks and safety relief valves.
 - (3) Pressure washing of equipment.
- (k) Combustion activities including the following:
 - (1) Fuel use related to food preparation for on-site consumption.
 - (2) Combustion emissions from propulsion of mobile sources.
- (l) Ventilation and venting related equipment including the following:
 - (1) Ventilation exhaust, central chiller water systems, refrigeration and air conditioning equipment, not related to any industrial or production process, including natural draft hoods or ventilating systems that do not remove air pollutants.
 - (2) Stack and vents from plumbing traps used to prevent the discharge of sewer gases, handling domestic sewage only, excluding those at wastewater treatment plants or those handling any industrial waste.
 - (3) Natural gas pressure regulator vents, excluding venting at oil and gas production facilities.
 - (4) Air vents from air compressors.
- (m) Activities related to routine fabrication, maintenance and repair of buildings, structures, equipment or vehicles at the source where air emissions from those activities would not be associated with any commercial production process including the following:
 - (1) Activities associated with the repair and maintenance of paved and unpaved roads, including paving or sealing, or both, of parking lots and roadways.
 - (2) Painting, including interior and exterior painting of buildings, and solvent use, excluding degreasing operations utilizing halogenated organic solvents.
 - (3) Brazing, soldering, or welding operations and associated equipment.
 - (4) Portable blast-cleaning equipment with enclosures.
 - (5) Lubrication, including hand-held spray can lubrication, dipping metal parts into lubricating oil, and manual or automated addition of cutting oil in machining operations.
 - (6) Instrument air dryer and filter maintenance.
 - (7) Tarring, retarring, and repair of roofs.
- (n) Activities performed using hand-held equipment including the following:
 - (1) Application of hot melt adhesives with no VOC in the adhesive formulation.
 - (2) Buffing.
 - (3) Cutting, excluding cutting torches.
 - (4) Drilling.

- (5) Grinding.
 - (6) Machining wood, metal, or plastic.
 - (7) Polishing.
 - (8) Routing.
 - (9) Sanding.
 - (10) Sawing.
 - (11) Turning wood, metal, or plastic.
 - (12) Surface grinding.
- (o) Housekeeping and janitorial activities and supplies including the following:
 - (1) Vacuum cleaning systems used exclusively for housekeeping or custodial activities, or both.
 - (2) Steam cleaning activities.
 - (3) Rest rooms and associated cleanup operations and supplies.
 - (4) Alkaline or phosphate cleaners and associated equipment.
 - (5) Mobile floor sweepers and floor scrubbers.
 - (6) Pest control fumigation.
- (p) Office related activities including the following:
 - (1) Office supplies and equipment.
 - (2) Photocopying equipment and associated supplies.
 - (3) Paper shredding.
 - (4) Blueprint machines, photographic equipment, and associated supplies.
- (q) Lawn care and landscape maintenance activities and equipment, including the storage, spraying or application of insecticides, pesticides and herbicides.
- (r) Storage equipment and activities including:
 - (1) Pressurized storage tanks and associated piping for the following:
 - (a) Acetylene.
 - (b) Liquid natural gas (LNG)(propane).
 - (2) Storage of drums containing maintenance raw materials.
 - (3) Portable containers used for the collection, storage, or disposal of materials provided the container capacity is equal to or less than 0.46 cubic meters and the container is closed except when the material is added or removed.
- (s) Emergency and standby equipment including:
 - (1) Safety and emergency equipment, except engine driven fire pumps, including fire suppression systems and emergency road flares.
- (t) Sampling and testing equipment and activities including the following:
 - (1) Equipment used for quality control/assurance or inspection purposes, including sampling equipment used to withdraw materials for analysis.
 - (2) Instrument air dryers and distribution.
- (u) Use of consumer products and equipment where the product or equipment is used at a source in the same manner as normal consumer use and is not associated with any production process.

- (v) Activities generating limited amounts of fugitive dust including:
 - (1) Fugitive emissions related to movement of passenger vehicles, provided the emissions are not counted for applicability purposes under 326 IAC 2-7-1(21)(B), and any required fugitive dust control plan or its equivalent is submitted.
 - (2) Road salting and sanding.
- (w) Activities associated with production including the following:
 - (1) Application equipment for hot melt adhesives with no VOC in the adhesive formulation.
 - (2) Air compressors and pneumatically operated equipment, including hand tools.
 - (3) Compressor or pump lubrication and seal oil systems.
- (x) Miscellaneous equipment, but not emissions associated with the process for which the equipment is used, and activities including the following:
 - (1) Equipment used for surface coating, painting, dipping or spraying operation, except those that will emit VOCs or HAPs.
 - (2) Electric or steam heated drying ovens and autoclaves, including only the heating emissions and not any associated process emissions.
 - (3) Manual loading and unloading operations.
 - (4) Construction and demolition operations.
 - (5) Mechanical equipment gear boxes and vents which are isolated from process materials.
- (y) Space heaters or process heaters using the following fuels.
 - (1) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
- (z) Combustion source flame safety purging on startup.
- (aa) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.
- (bb) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (cc) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
 - (1) Cleaners and solvents characterized as follows:
 - (A) having a vapor pressure equal to or less than 2 kPa; 15mm Hg; or 0.3 psi measured at 38 degrees C (100 degrees F); or
 - (B) having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20 degrees C (68 degrees F);

the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (dd) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, and welding

equipment.

- (ee) Any operation using aqueous solutions containing less than 1% by weight of VOCs and excluding HAPs.
- (ff) Water based adhesives that are less than or equal to 5% by volume of VOCs and excluding HAPs.
- (gg) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (hh) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone.
- (ii) Paved and unpaved roads and parking lots with public access.
- (jj) One-site fire and emergency response training approved by the department.
- (kk) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.
- (ll) Filter or coalescer media changeout.

Enforcement Issues

IDEM is aware that this source has been constructed and operated prior to receipt of the proper permit. IDEM is reviewing this matter and will take the appropriate action. This proposed approval is intended to satisfy the requirements of the construction permit rules.

Stack Summary

Stack/Vent ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
Cure 1	Rubber Curing Chambers (Cure 1 through Cure 6)	30.00	0.50	15,000	200
Trailer 1, 2, 3	Tire Buffing Systems (TB-1 through TB-3) and Tire Repair/Patch Areas (SK-1 through SK-3)	12.00	0.875	2,000	Ambient
P01A	Surface Coating (P01)	30.00	3.00	20,000	Ambient
P01B	Surface Coating (P01)	30.00	3.00	20,000	Ambient

Emission Calculations

See Appendix A of this document for detailed emission calculations (pages 1 through 12).

Potential to Emit Before Controls

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emission unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is

enforceable by the U. S. EPA, IDEM, or the appropriate local air pollution control agency.”

Pollutant	Potential Emissions (tons/year)
PM	94.21
PM-10	94.21
SO ₂	0.00
VOC	51.26
CO	0.00
NO _x	0.00

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

Pollutant	Potential Emissions (tons/year)
Xylene	0.28
Trichloroethylene	2.75
Hexane	9.84
Ethyl Benzene	0.08
Hexamethylene Diisocyanate	0.004
Ethylene Oxide	0.0008
Total HAPs	15.37

The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM-10, CO, NO_x, SO₂, and VOC are less than 100 tons per year and the potential to emit of PM-10 and VOC are greater than 25 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. An MSOP will be issued.

Source Status

New Source PSD Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/yr)
PM	< 250
PM-10	< 100
SO ₂	< 100
VOC	< 100
CO	< 100
NO _x	< 100
Single HAP	< 10
Total HAPs	< 25

This new source is not a major stationary source for PSD purposes because no attainment pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the 28 listed source categories. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

Federal Rule Applicability Determination

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (b) This source is not subject to the requirements of 40 CFR Part 60, Subpart BBB (Standards of Performance for the Rubber Tire Manufacturing Industry), which are incorporated by reference at 326 IAC 12, because this source is a tire retreading plant and not a rubber tire manufacturing plant. Therefore, the requirements 40 CFR Part 60, Subpart BBB have not been included in the permit.
- (c) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 326 IAC 20, and 40 CFR Part 63) applicable to this source.
- (d) The requirements of 40 CFR Part 63, Subpart XXXX (National Emission Standards for Hazardous Air Pollutants: Rubber Tire Manufacturing Industry), which are incorporated by reference at 326 IAC 20, apply to sources that manufacture rubber tires and/or rubber components integral to rubber tires, which are located at a major source of hazardous air pollutants (HAPs). This source is not a major source of hazardous air pollutants. Therefore, the requirements of 40 CFR Part 63, Subpart XXXX are not applicable.
- (e) The requirements of 40 CFR Part 63, Subpart MMMM (National Emission Standards for Hazardous Emissions for Surface Coating of Miscellaneous Metal Parts and Products), which are incorporated by reference at 326 IAC 20, apply to miscellaneous metal parts and products surface coating facilities, which are located at a major source of hazardous air pollutants (HAPs). This source is not a major source of HAPs. Therefore, the requirements of 40 CFR Part 63, Subpart MMMM are not applicable.

State Rule Applicability Determination

326 IAC 2-2 (Prevention of Significant Deterioration, PSD)

This source is not considered a major source under 326 IAC 2-2 (PSD) because it is not one of the 28 listed source categories under 326 IAC 2-2-1(gg) and the potential to emit of SO₂, NO_x, VOCs, CO, PM, and PM-10 are less than 250 tons per year each. Therefore, the requirements of 326 IAC 2-2 (PSD) are not applicable to this source.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

The potential to emit for this source is less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for a combination of HAPs. Therefore, the requirements of 326 IAC 2-4.1 (MACT) do not apply.

326 IAC 2-6 (Emission Reporting)

Pursuant to 326 IAC 2-6-1, this source is not subject to this rule because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, LaPorte, or Porter Counties, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.

326 IAC 8-2-9 (Miscellaneous Metal Coating)

Pursuant to 326 IAC 8-2-1(a)(4), the requirements of 326 IAC 8-2-9 apply to facilities as described below which were constructed after July 1, 1990, located in any county, and which have actual emissions of greater than 15 pounds of VOCs per day before add-on controls.

The requirements of 326 IAC 8-2-9 apply to the surface coating of the following:

- (1) Large and small farm machinery;
- (2) Small household appliances;
- (3) Office equipment;
- (4) Industrial machinery; or
- (5) Any other industrial category which coats metal parts or products under the Standard Industrial Classification Code of major groups #33, #34, #35, #36, #37, #38, and #39.

The requirements of 329 IAC 8-2-9 do not apply to surface coating operation P01, to be installed in 2007, which will be used to coat metal trailers because the potential to emit of VOCs for P01 is less than 15 pounds per day. Therefore, the requirements of 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations) are not included in the permit.

The requirements of 329 IAC 8-2-9 do not apply to powder coating operation PCB-1, installed in 1996, and used to coat metal tire rims because this operation does not utilize coatings that contain VOCs.

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

- (a) Pursuant to 326 IAC 6-3-2(d), particulate from the surface coating operation (P01) and tire coating operation (BTP-1) shall be controlled by a dry particulate filter, water wash, or equivalent control device. The Permittee shall operate the control device in accordance with manufacturer's specifications.

If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:

- (1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
- (2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

The source utilizes dry particulate filters to comply with 326 IAC 6-3-2(d) for the surface coating operation P01. The source utilizes a metal enclosure for tire coating operation BTP-1, which has been determined by IDEM, OAQ to be an equivalent control device for the purposes of 326 IAC 6-3-2(d).

- (b) Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from each of the following operations shall not exceed the pounds per hour limitations specified below: The pound per hour limitations were calculated with the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

Unit ID	Unit Description	Process Weight Rate (tons/hr)	Allowable Particulate Emission Limit (lbs/hr)	Uncontrolled PM Emissions (lbs/hr)	Controlled PM Emissions (lbs/hr)
TB-1	Tire Buffing System	0.63*	2.99	2.70	0.13
TB-2	Tire Buffing System	0.63*	2.99	2.70	0.13
TB-2	Tire Buffing System	0.63*	2.99	2.70	0.13
RSB-1	Shot Blasting (Tire Rims)	< 0.05	< 0.551	3.77	0.19
PCB-1	Rim Powder Coating System	< 0.05	< 0.551	2.06	0.10

* The process weight rate for each tire buffing operation was based on an estimate weight of each tire (125 pounds each) and the maximum number of tires per hour (10 tires per hour).

The calculated uncontrolled hourly particulate emission rates for each of the three tire buffing operations are less than the allowable particulate emission rates in the above table. However, the potential to emit calculations are based on emission factors that have not been verified by testing. As such, the van trailer wall filters shall be in place and controlling particulate emissions at all times the tire buffing systems are in operation.

The controlled hourly particulate emission rates for the shot blasting operation (RSB-1) and the rim powder coating system (PCB-1) are less than the allowable particulate emission rates in the above table. In order to comply with the allowable particulate emission limits of 326 IAC 6-3-2 for the shot blasting operation (RSB-1) and the rim powder coating system (PCB-1), the cartridge type dust filters shall be in operation and controlling particulate emissions at all times the shot blasting unit and rim powder coating system are in operation.

- (c) The extruders (Base 1 through Base 2 and Tread 1 through Tread 4) each have a potential to emit of PM of less than 0.551 pounds per hour. Pursuant to 326 IAC 6-3-1(b)(14), operations that have a potential to emit of PM of less than 0.551 lb/hr are exempt from the requirements of 326 IAC 6-3-2. Therefore, the requirements of 326 IAC 6-3-2 are not applicable to these facilities.

326 IAC 8-1-6 (New facilities: general reduction requirements)

The requirements of 326 IAC 8-1-6 are applicable to facilities constructed after January 1, 1980 and which have the potential to emit of 25 tons per year or more of VOCs. There are no facilities at this source that have a potential to emit of VOCs greater than 25 tons per year. Therefore, the requirements of 326 IAC 8-1-6 do not apply.

326 IAC 8-6 (Organic Solvent Emission Limitations)

This rule applies to sources commencing operation after October 7, 1974 and prior to January 1, 1980 that are located anywhere in the state, with potential VOC emissions of 100 tons per year or more, and not regulated by any other provision of Article 8. The source has a potential to emit of VOCs of less than 100 tons per year. Therefore, this rule does not apply to this source.

There are no other article 8 (326 IAC 8) rules applicable to this source.

Testing Requirements

In order to demonstrate compliance with Conditions D.1.1 and D.1.2 (to verify that the uncontrolled PM and PM-10 emission factors are each less than or equal to 0.05 pounds per pound of rubber removed), the Permittee shall perform PM and PM-10 testing for the tire buffing system(s) within 90 days after issuance of the permit, utilizing methods as approved by the Commissioner. This is a one time testing requirement. PM-10 includes filterable and condensable PM-10. Testing shall be conducted in accordance with Section C - Performance Testing.

[Note: The source shall assume a maximum overall control efficiency of 95% for the van trailer wall filters and water misting to calculate the uncontrolled PM and PM-10 emission factors for the tire buffing systems.]

Compliance Determination and Compliance Monitoring

The following compliance determination and compliance monitoring requirements apply to the source:

- (a) The following compliance determination and compliance monitoring requirements apply to the tire buffing systems (TB-1, TB-2, and TB-3):
 - (1) Visible emission notations of the tire buffing systems (TB-1, TB-2, and TB-3) vent exhausts (trailer vents 1, 2, and 3) shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
 - (2) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
 - (3) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
 - (4) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
 - (5) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.
 - (6) Daily inspections shall be performed to verify the placement, integrity and particle loading of the wall filters for the accumulation trailer(s). To monitor the performance of the wall filters, daily visible emission notations shall be made of the accumulation trailer(s) vents (trailer vents 1, 2, and 3) while one or more of the tire buffing systems (TB-1, TB-2, and TB-3) are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C -

Response to Excursions or Exceedances, shall be considered a deviation from this permit.

- (7) In the event that a wall filter failure has been observed:

The associated process will be shut down immediately until the failed wall filters have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions). Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

These monitoring conditions are necessary because the wall filters must operate properly at all times that the tire buffing systems (TB-1, TB-2, and TB-3) are in operation to ensure compliance with 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes).

- (b) The following compliance determination and compliance monitoring requirements apply to the rim shot blasting unit (RSB-1):

The Permittee shall record the pressure drop across the cartridge-type dust filters used in conjunction with the shot blasting unit (RSB-1), at least once daily when the shot blasting unit is in operation. When for any one reading, the pressure drop across the dust filters are outside the normal range of 0.5 and 3.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

These monitoring conditions are necessary because the cartridge-type dust filters must operate properly at all times that the shot blasting unit (RSB-1) is in operation to ensure compliance with 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes).

- (c) The following compliance determination and compliance monitoring requirements apply to the rim powder coating system (PCB-1):

Daily inspections shall be performed to verify the placement, integrity and particle loading of the cartridge-type dust filters for the rim powder coating system (PCB-1). If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

In the event that a cartridge-type dust filter failure has been observed:

The associated process will be shut down immediately until the failed dust filters have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions). Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be

considered a deviation from this permit.

These monitoring conditions are necessary because the cartridge-type dust filters must operate properly at all times that the powder coating system (PCB-1) is in operation to ensure compliance with 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes).

Conclusion and Recommendation

The construction and operation of this source shall be subject to the conditions of the attached proposed New Source Review and MSOP No.: M003-22686-00342. The staff recommends to the Commissioner that this New Source Review and MSOP be approved.

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Company Name: Isaac Tire Premium Bandag
Address: 3525 Independence Drive, Fort Wayne, IN 46808
Permit Number: M003-22686-00342
Reviewer: Tanya White/EVP
Date: 09/06/07

Uncontrolled Potential Emissions (tons/year)										
Emissions Generating Activity										
Pollutant	Surface Coating (P01)	Shot Blasting (Rim Cleaning RSB-1)	Powder Coating Operations (PCB-1)	Three Tire Buffing Systems (TB-1, TB-2, and TB-3)	Tire Patch/Repair Areas (SK-1, SK-2, and SK-3)	Tire Coating Operation (BTP-1)	Cushion Extruders (Base 1 and Base 2)	Tread Extruders (Tread 1 - Tread 4)	Hot Air Curing (Cure 1 - Cure 6)	Total
PM	4.29	16.52	9.01	35.48	0.00	28.91	0.0003	0.0004	0.00	94.21
PM-10	4.29	16.52	9.01	35.48	0.00	28.91	0.0003	0.0004	0.00	94.21
SO ₂	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
NOx	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
VOC	2.73	0.00	0.00	0.00	8.17	14.30	0.36	0.55	25.14	51.26
CO	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
total HAPs	0.37	0.00	0.00	0.00	2.75	0.00	0.17	0.26	11.82	15.37
worst case single HAP	0.28	0.00	0.00	0.00	2.75	0.00	0.14	0.21	9.50	9.84
	Xylene				Trichloroethylene		Hexane	Hexane	Hexane	Hexane
Total emissions based on rated capacity at 8,760 hours/year.										
Controlled/Limited Potential Emissions (tons/year)										
Emissions Generating Activity										
Pollutant	Surface Coating (P01)	Shot Blasting (Rim Cleaning RSB-1)	Powder Coating Operations (PCB-1)	Three Tire Buffing Systems (TB-1, TB-2, and TB-3)	Tire Patch/Repair Areas (SK-1, SK-2, and SK-3)	Tire Coating Operation (BTP-1)	Cushion Extruders (Base 1 and Base 2)	Tread Extruders (Tread 1 - Tread 4)	Hot Air Curing (Cure 1 - Cure 6)	Total
PM	0.42	0.83	0.45	1.77	0.00	14.45	0.0003	0.0004	0.00	17.92
PM-10	0.42	0.83	0.45	1.77	0.00	14.45	0.0003	0.0004	0.00	17.92
SO ₂	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
NOx	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
VOC	2.73	0.00	0.00	0.00	8.17	14.30	0.36	0.55	25.14	51.26
CO	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
total HAPs	0.37	0.00	0.00	0.00	2.75	0.00	0.17	0.26	11.82	15.37
worst case single HAP	0.28	0.00	0.00	0.00	2.75	0.00	0.14	0.21	9.50	9.84
	Xylene				Trichloroethylene		Hexane	Hexane	Hexane	Hexane
Total emissions based on rated capacity at 8,760 hours/year, after control or usage limitations.										

**Appendix A: Emission Calculations
VOC and Particulate - As Applied
From Surface Coating Operations (P01)**

Company Name: Isaac Tire Premium Bandag
Address: 3525 Independence Drive, Fort Wayne, IN 46808
Permit Number: M003-22686-00342
Reviewer: Tanya White/EVP
Date: 09/06/07

Emission Unit Description	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC (tons/yr)	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Surface Coating Operation (P01)	10.61	31.80%	10.10%	21.70%	0.00%	50.94%	6.50	0.042	2.30	2.30	0.62	14.97	2.73	4.29	0.00	50%

Potential Emissions (tons/yr)
Controlled Potential Emissions (tons/yr)

0.62 14.97 2.73 4.29
0.42

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) x Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) x Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) x Gal of Material (gal/unit) x Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) x Gal of Material (gal/unit) x Maximum (units/hr) x (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) x Gal of Material (gal/unit) x Maximum (units/hr) x (8,760 hr/yr) x (1 ton/2,000 lbs)
Particulate Potential Tons per Year = Maximum (units/hour) x Gal of Mat. (gal/unit) x Density (lbs/gal) x (1- Weight % Volatiles) x (1-Transfer efficiency %) x (8,760 hrs/yr) x (1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) x Weight % organics) / (Volume % solids)
The overall control efficiency of the dry filters was assumed to be 90.25%, which is based on a manufacturer's estimated control efficiency of 95% (for PM2.5) and a capture efficiency of 95%.

Appendix A: Emission Calculations
HAP Emission Calculations - As Applied
From Surface Coating Operations (P01)

Company Name: Isaac Tire Premium Bandag
Address: 3525 Independence Drive, Fort Wayne, IN 46808
Permit Number: M003-22686-00342
Reviewer: Tanya White/EVP
Date: 09/06/07

Emission Unit Description	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Ethyl Benzene	Weight % Xylene	Weight % Hexamethylene Diisocyanate	Ethyl Benzene Emissions (tons/yr)	Xylene Emissions (tons/yr)	Hexamethylene Diisocyanate Emissions (tons/yr)
Surface Coating Operation (P01)	10.61	6.50	0.042	0.66%	2.23%	0.03%	0.08	0.28	0.004

Potential Emissions (tons/yr): Single HAP

0.28

Potential Emissions (tons/yr): Total HAPs

0.37

METHODOLOGY

HAP emission rate (tons/yr) = Density (lb/gal) x Gallons of Material (gal/unit) x Maximum (unit/hr) x Weight % HAP x 8,760 hrs/yr x 1 ton/2,000 lbs

**Appendix A: Emission Calculations
Particulate, VOC, and HAP Emissions
From Tire Buffing (Trimming) Operations (TB-1 through TB-3)**

Company Name: Isaac Tire Premium Bandag
Address: 3525 Independence Drive, Fort Wayne, IN 46808
Permit Number: M003-22686-00342
Reviewer: Tanya White/EVP
Date: 09/06/07

Emission Unit Description	Maximum Hourly Throughput (tires/hr)	Material Removed from Each Tire (lbs/tire)	Maximum Material Removed (lbs/hr)	Maximum Material Removed (lbs/yr)	PM/PM-10 Emission Factor (lb/lb rubber removed)*	Reduction for Water Mist (%)	PM/PM-10 Potential to Emit (tons/yr)	Control Device	Control Efficiency	PM/PM-10 Controlled Potential to Emit (tons/yr)
Tire Buffer (TB-1)	10.00	10.80	108.00	946,080	0.050	50%	11.83	Wall Filters	95.00%	0.59
Tire Buffer (TB-2)	10.00	10.80	108.00	946,080	0.050	50%	11.83	Wall Filters	95.00%	0.59
Tire Buffer (TB-3)	10.00	10.80	108.00	946,080	0.050	50%	11.83	Wall Filters	95.00%	0.59

Potential Emissions (tons/yr):

35.48

1.77

METHODOLOGY

* The PM/PM-10 emission factors must be verified by performance testing.

Potential to Emit (tons/yr) = Maximum Material Removed (lbs/yr) x Emission Factor (lb/lb rubber removed) x (Reduction for Water Mist %) x (1 ton/2,000 lbs)

PM/PM-10 Controlled Potential to Emit (tons/yr) = Maximum Material Removed (lbs/yr) x PM/PM-10 Emission Factor (lb/lb rubber removed) x (Reduction for Water Mist %) x (1 ton/2,000 lbs) x (1-Overall Control Efficiency %)

The control efficiency of the wall filters was assumed to be 95%.

U.S. AP-42, Chapter 4.12 (Grinding) emission factors for VOCs and HAPs are based on tire grinding operations. VOC and HAP emissions were not calculated for these tire buffing (trimming) operations because the tire buffing operations do not generate sufficient friction/heat to release VOC and HAP emissions.

Appendix A: Emission Calculations
Particulate Emissions
From Shot Blasting (Rim Cleaning RSB-1)

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Company Name: Isaac Tire Premium Bandag
Address: 3525 Independence Drive, Fort Wayne, IN 46808
Permit Number: M003-22686-00342
Reviewer: Tanya White/EVP
Date: 09/06/07

Emission Unit Description	Outlet Grain Loading (gr/acf)	Control Device Fan Flow Rate (acfm)	PM/PM-10 Control Efficiency (%)	Potential PM/PM-10 Emission Rate			
				Before Controls (lb/hr)	Before Controls (tons/yr)	After Controls (lb/hr)	After Controls (tons/yr)
Rim Cleaning Operations (RSB 1)	0.02	1,100.00	95.00%	3.77	16.52	0.19	0.83

Methodology:

Potential Uncontrolled Emissions (tons/yr) = Outlet Loading (grains/acf) x Fan Flow Rate (acfm) x 1 lb/7,000 grains x 60 min/hr x 8,760 hr/yr x 1 ton/2,000 lbs

Potential Controlled Emissions (tons/yr) = Outlet Loading (grains/acf) x Fan Flow Rate (acfm) x 1 lb/7,000 grains x 60 min/hr x 8,760 hr/yr x 1 ton/2,000 lbs x (1 - Control Efficiency %)

Total PM is assumed equal to PM-10.

The control efficiency of the cartridge-type dust filters was assumed to be 95%.

Appendix A: Emission Calculations
Particulate Emissions
From Powder Coating Operations (PCB-1)

Page 6 of 12

Company Name: Isaac Tire Premium Bandag
Address: 3525 Independence Drive, Fort Wayne, IN 46808
Permit Number: M003-22686-00342
Reviewer: Tanya White/EVP
Date: 09/06/07

Emission Unit Description	Outlet Grain Loading (gr/acf)	Control Device Fan Flow Rate (acfm)	PM/PM-10 Control Efficiency (%)	Potential PM/PM-10 Emission Rate			
				Before Controls (lb/hr)	Before Controls (tons/yr)	After Controls (lb/hr)	After Controls (tons/yr)
Rim Coating Operations (PCB-1) - Powder Coating	0.03	400.00	95.00%	2.06	9.01	0.10	0.45

Methodology:

Potential Uncontrolled Emissions (tons/yr) = Outlet Loading (grains/acf) x Fan Flow Rate (acfm) x 1 lb/7,000 grains x 60 min/hr x 8,760 hr/yr x 1 ton/2,000 lbs
Potential Controlled Emissions (tons/yr) = Outlet Loading (grains/acf) x Fan Flow Rate (acfm) x 1 lb/7,000 grains x 60 min/hr x 8,760 hr/yr x 1 ton/2,000 lbs x (1 - Control Efficiency %)
Total PM is assumed equal to PM-10.
The control efficiency of the cartridge-type dust filters was assumed to be 95%.

**Appendix A: Emission Calculations
VOC and Particulate - As Applied
From Tire Coating Operations (BTP-1)**

Company Name: Isaac Tire Premium Bandag
Address: 3525 Independence Drive, Fort Wayne, IN 46808
Permit Number: M003-22686-00342
Reviewer: Tanya White/EVP
Date: 09/06/07

Emission Unit Description	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC (tons/yr)	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Tire Coating Operation (BTP-1)	8.33	77.55%	72.00%	5.55%	0.00%	22.44%	0.12	60.00	0.46	0.46	3.26	78.34	14.30	28.91	0.00	50%

Potential Emissions (tons/yr)
Controlled Emissions (tons/yr)

3.26
78.34
14.30
28.91
14.45

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) x Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) x Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) x Gal of Material (gal/unit) x Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) x Gal of Material (gal/unit) x Maximum (units/hr) x (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) x Gal of Material (gal/unit) x Maximum (units/hr) x (8760 hr/yr) x (1 ton/2000 lbs)
Particulate Potential Tons per Year = Maximum (units/hour) x Gal of Mat. (gal/unit) x Density (lbs/gal) x (1- Weight % Volatiles) x (1-Transfer efficiency) x (8,760 hrs/yr) x (1 ton/2,000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) x Weight % organics) / (Volume % solids)
There are source utilized a metal enclosure for particulate (PM/PM-10) control. The control efficiency has been conservatively estimated at 50%.

Appendix A: Emission Calculations
VOC Emissions
From Tire Repair Areas (SK-1, SK-2, and SK-3)

Company Name: Isaac Tire Premium Bandag
Address: 3525 Independence Drive, Fort Wayne, IN 46808
Permit Number: M003-22686-00342
Reviewer: Tanya White/EVP
Date: 09/06/07

Emission Unit Description	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC (tons/yr)	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Blue Tire Repair Cement	12.10	92.50%	0.00%	92.50%	0.00%	N/A	0.0017	30.00	11.19	11.19	0.57	13.70	2.50	0.00	0.00	100%
Universal Cement	6.00	86.70%	0.00%	86.70%	0.00%	N/A	0.0016	30.00	5.20	5.20	0.25	5.99	1.09	0.00	0.00	100%
Bandag Solvent	5.77	97.70%	0.00%	97.70%	0.00%	N/A	0.0016	30.00	5.64	5.64	0.27	6.49	1.19	0.00	0.00	100%
BTP Concentrate	8.33	50.00%	0.00%	50.00%	0.00%	N/A	0.0062	30.00	4.17	4.17	0.77	18.59	3.39	0.00	0.00	100%

Potential Emissions (tons/yr)

1.87 44.78 8.17 0.00

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) x Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (lb/gal) x Weight % Organics)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) x Gal of Material (gal/unit) x Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) x Gal of Material (gal/unit) x Maximum (units/hr) x (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) x Gal of Material (gal/unit) x Maximum (units/hr) x (8,760 hr/yr) x (1 ton/2,000 lbs)

Particulate Potential Tons per Year = Maximum (units/hour) x Gal of Mat. (gal/unit) x Density (lbs/gal) x (1- Weight % Volatiles) x (1-Transfer efficiency %) x (8,760 hrs/yr) x (1 ton/2,000 lbs)

Appendix A: Emission Calculations
From Tire Repair Areas (SK-1, SK-2, and SK-3) - HAP Emission
Calculations

Company Name: Isaac Tire Premium Bandag
Address: 3525 Independence Drive, Fort Wayne, IN 46808
Permit Number: M003-22686-00342
Reviewer: Tanya White/EVP
Date: 09/06/07

Emission Unit Description	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Trichloroethylene	Weight % Ethylene Oxide	Trichloroethylene Emissions (tons/yr)	Ethylene Oxide Emissions (tons/yr)
Blue Tire Repair Cement	12.10	0.0017	33.00	92.50%	0.00%	2.75	0.00
Universal Cement	6.00	0.0016	33.00	0.00%	0.00%	0.00	0.00
Bandag Solvent	5.77	0.0016	33.00	0.00%	0.00%	0.00	0.00
BTP Concentrate	8.33	0.0062	33.00	0.00%	0.01%	0.00	0.00075

Potential Emissions (tons/yr): Single HAP

2.75

Potential Emissions (tons/yr): Total HAPs

2.75

METHODOLOGY

HAP emission rate (tons/yr) = Density (lb/gal) x Gallons of Material (gal/unit) x Maximum (unit/hr) x Weight % HAP x 8,760 hrs/yr x 1 ton/2,000 lbs

Appendix A: Emission Calculations
VOC and HAP Emissions
From Two (2) Cushion Extruders (Base 1 and Base 2)

Company Name: Isaac Tire Premium Bandag
Address: 3525 Independence Drive, Fort Wayne, IN 46808
Permit Number: M003-22686-00342
Reviewer: Tanya White/EVP
Date: 09/06/07

Emission Unit Description	Maximum Hourly Throughput (tires/hr)	Rubber Extruded (lbs/tire)	Maximum Rubber Extruded (lbs/hr)	Maximum Rubber Extruded (lbs/yr)	PM/PM-10 Emission Factor (lb/lb rubber extruded)	PM/PM-10 Potential to Emit (tons/yr)	VOC Emission Factor (lb/lb rubber extruded)	VOC Potential to Emit (tons/yr)	Total HAPs Emission Factor (lb/lb rubber removed)	Total HAPs Potential to Emit (tons/yr)	Single HAP (Hexane) Emission Factor (lb/lb rubber removed)	Single HAP (Hexane) Potential to Emit (tons/yr)
Cushion Extruders (Base 1)	10.00	26.00	260.00	2,277,600.00	1.12E-07	0.00	1.60E-04	0.18	7.52E-05	0.09	6.05E-05	0.07
Cushion Extruders (Base 2)	10.00	26.00	260.00	2,277,600.00	1.12E-07	0.00	1.60E-04	0.18	7.52E-05	0.09	6.05E-05	0.07
Potential Emissions (tons/yr):						0.00		0.36		0.17		0.14

METHODOLOGY

The emission factors are from U.S. EPA, AP-42, 5th Edition, Chapter 4.12, Table 4.12-6 (Extruder).
Potential to Emit (tons/yr) = Maximum Rubber Extruded (lbs/yr) x Emission Factor (lb/lb rubber extruded) x (1 ton/2,000 lbs)

Appendix A: Emission Calculations
VOC and HAP Emissions
From Four (4) Tread Extruders (Tread-1 through Tread-4)

Company Name: Isaac Tire Premium Bandag
Address: 3525 Independence Drive, Fort Wayne, IN 46808
Permit Number: M003-22686-00342
Reviewer: Tanya White/EVP
Date: 09/06/07

Emission Unit Description	Maximum Hourly Throughput (tires/hr)*	Rubber Extruded (lbs/tire)	Maximum Rubber Extruded (lbs/hr)	Maximum Rubber Extruded (lbs/yr)	PM/PM-10 Emission Factor (lb/lb rubber extruded)	PM/PM-10 Potential to Emit (tons/yr)	VOC Emission Factor (lb/lb rubber extruded)	VOC Potential to Emit (tons/yr)	Total HAPs Emission Factor (lb/lb rubber removed)	Total HAPs Potential to Emit (tons/yr)	Single HAP (Hexane) Emission Factor (lb/lb rubber removed)	Single HAP (Hexane) Potential to Emit (tons/yr)
Four (4) Tread Extruders	30.00	26.00	780.00	6,832,800.00	1.12E-07	0.00	1.60E-04	0.55	7.52E-05	0.26	6.05E-05	0.21
Potential Emissions (tons/yr):						0.00		0.55		0.26		0.21

METHODOLOGY

The emission factors are from U.S. EPA, AP-42, 5th Edition, Chapter 4.12, Table 4.12-6 (Extruder).
Potential to Emit (tons/yr) = Maximum Rubber Extruded (lbs/yr) x Emission Factor (lb/lb rubber extruded) x (1 ton/2,000 lbs)
*Each of the four (4) tread extruders has a capacity of 10 tires per hour. However, the maximum hourly throughput is based on the maximum capacity of the other equipment prior to this process, such as the tire buffing systems and the cushion extruders.

Appendix A: Emission Calculations
VOC and HAP Emissions
From Six (6) Hot Air Curing Chambers (Cure 1 through Cure 6)

Company Name: Isaac Tire Premium Bandag
Address: 3525 Independence Drive, Fort Wayne, IN 46808
Permit Number: M003-22686-00342
Reviewer: Tanya White/EVP
Date: 09/06/07

Emission Unit Description	Maximum Hourly Throughput (tires/hr)*	Process Weight (lbs/tire)	Maximum Hourly Process Weight (lbs/hr)	Maximum Process Weight (lbs/yr)	PM/PM-10 Emission Factor (lb/lb rubber)	PM/PM-10 Potential to Emit (tons/yr)	VOC Emission Factor (lb/lb rubber)	VOC Potential to Emit (tons/yr)	Total HAPs Emission Factor (lb/lb rubber)	Total HAPs Potential to Emit (tons/yr)	Single HAP (Hexane) Emission Factor (lb/lb rubber)	Single HAP (Hexane) Potential to Emit (tons/yr)
Six (6) Hot Air Curing Chambers	30.00	26.00	780.00	6,832,800.00	0.00E+00	0.00	7.36E-03	25.14	3.46E-03	11.82	2.78E-03	9.50
Potential Emissions (tons/yr):						0.00		25.14		11.82		9.50

METHODOLOGY

The emission factors are from U.S. EPA, AP-42, 5th Edition, Chapter 4.12, Table 4.12-10 (Hot Air Curing).
Potential to Emit (tons/yr) = Maximum Process Weight (lbs/yr) x Emission Factor (lb/lb rubber) x (1 ton/2,000 lbs)
*Each of the six (6) hot air curing chambers has a capacity of 5.5 tires per hour. However, the maximum hourly throughput is based on the maximum capacity of the other equipment prior to this process, such as the tire buffing systems and the cushion extruders.